

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing	CASE NO.: 19-23780-JNP CHAPTER 13 HEARING DATE: July 6, 2021 JUDGE: Jerrold N. Poslusny Jr.
In Re: Kathleen L Baylock Debtor.	

**RESPONSE TO DEBTOR'S MOTION TO REINSTATE THE AUTOMATIC STAY AS
NewRez LLC d/b/a Shellpoint Mortgage Servicing**

COMES NOW, NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Secured Creditor"), by and through undersigned counsel, hereby files its Response to Debtor's Motion to Reinstate Automatic Stay and, in support thereof, states as follows:

1. Secured Creditor holds a mortgage on the property located at 1446 S 9TH ST Camden, New Jersey 08104 ("Property").
2. On July 16, 2019, Debtor filed a Voluntary Chapter 13 Bankruptcy Petition.
3. On March 2, 2020 an agreed order resolving Motion for Relief from Stay was entered as to the Secured Creditor and Property (DE 42).
4. On February 9, 2021 Creditor filed a Certification of Default. (DE 63).
5. On March 10, 2021 an order vacating the stay was entered followed by dismissal of the case on April 22, 2021.
6. On June 10, 2021 an order was entered vacating the dismissal of the case (DE 83).
7. On June 4, 2021, Debtor filed a Motion to Reinstate stay as to New Rez d/b/a Shellpoint Mortgage Servicing.

8. Debtor currently owes Secured Creditor post-petition arrears in the sum of \$11,924.51 as of 6/23/2021.
9. Secured Creditor has received no funds or payments since relief was granted.
10. The stay as to Secured Creditor should therefore not be re-imposed.
11. Secured Creditor reserves the right to amend and or supplement this response prior to the hearing.

WHEREFORE, Secured Creditor respectfully requests entry of an order denying Debtor's Motion to Reinstate the Automatic Stay as to Secured Creditor and all further relief this Court deems just and proper.

RAS Citron, LLC
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707
By: /s/ Harold N. Kaplan_____
Harold N. Kaplan, Esquire
Bar ID: HK0226
Email: hkaplan@raslg.com

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CERTIFICATION OF SERVICE AND PROOF OF MAILING

I, Harold Kaplan, Esq.:

☒ represent the respondent in the above-captioned matter.

☐ am the secretary/paralegal for _____, you represent the _____
in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

On 6/24/2021 I caused to be sent a copy of the following pleadings and/or documents to the parties listed in the chart below: Response to Debtor's Motion to Reinstate the Automatic Stay

I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 6/24/2021

By: /s/ Harold N. Kaplan
Harold N. Kaplan, Esquire
Bar ID: HK0226
Email: hkaplan@raslg.com

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Mark W Ford Law Office of Mark W. Ford, LLC P.O. Box 110 4 1/2 North Broadway Gloucester City, NJ 08030	Debtor(s) Attorney	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Kathleen L Baylock 1446 S. 9th Street Camden, NJ 08104	Debtor(s)	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.